

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

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H-15-295

v.

HERIBERTO LATIGO

UNITED STATES' MOTION FOR RECIPROCAL DISCOVERY

1. The United States has complied with the defendant's request for disclosure and inspection pursuant to Fed. R. Cr. P. 16 (a)(1).

2. The United States requests, pursuant to Fed. R. Cr. P. 16 (b)(1)(A), that the defendant permit the government to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, buildings or places, or copies or portions of any of these items, which are within the defendant's possession, custody, or control and which the defendant intends to use in the defendant's case-in-chief at trial.

3. The United States requests, pursuant to Fed .R. Cr. P. 16 (b)(1)(B), that the defendant permit the government to inspect and to copy or photograph the results or reports of any physical or mental examination and of any scientific test or experiment which is within the defendant's possession, custody, or control and which the defendant intends to use in the defendant's case-in-chief at trial, or if the defendant intends to call the witness who prepared the report and the report relates to the witness's testimony.

4. The United States requests, pursuant to Fed. R. Cr. P. 16 (b)(1)(C), that the defendant give a written summary of any testimony that the defendant intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence as evidence at trial. Any summary provided pursuant to this request must describe the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications.

Respectfully submitted,

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By: /s/ Sherri L. Zack
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CERTIFICATE OF SERVICE

This is to certify that on the 21st day of July, 2015, a copy of the United States' motion for reciprocal discovery was sent to counsel for defendant via ECF.

/s/ Sherri L. Zack
Sherri L. Zack
Assistant United States Attorney

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